

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

THELMA P. WILLIS  
28028 Creamery Street  
Kennedyville, Kent County, MD 21645

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PLAINTIFF

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v.

\*

Case No.: AMD 02 CV3802

KERI L. DOUGHERTY  
442 Gateswood Drive  
West Chester, PA 19380

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and

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KEVIN P. DOUGHERTY  
442 Gateswood Drive  
West Chester, PA 19380

\*

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and

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GEORGIANA DOUGHERTY  
442 Gateswood Drive  
West Chester, PA 19380

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DEFENDANTS

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\* \* \* \* \*

**RESPONSE TO SHOW CAUSE ORDER**

THELMA P. WILLIS, Plaintiff, by and through her attorney Samuel H. Paavola, responds to the Show Cause Order, issued by this Court on March 17, 2003, and respectfully states:

1. This personal injury claim involves three Defendants. Mr. Greg Cugino was employed by the Plaintiff to serve the three Defendants. Mr. Cugino is a professional private process server. Two Defendants were served; Kevin P. Dougherty and Georgiana Dougherty, on March 13, 2003.

2. The two Defendants who were served are the parents of the third Defendant, Keri L. Dougherty. The private process server asked the parents if they would accept service on behalf of Keri Dougherty or alternatively whether they would provide the address or current whereabouts of Keri Dougherty. The parents would not disclose the information apparently because they were angry that litigation had been filed.

3. The process server, Mr. Greg Cugino, has been making efforts during the past two weeks to determine the whereabouts of Keri Dougherty, including checking available data banks and state agencies for information that will lead to the current location of Keri Dougherty.

4. The Plaintiff has reason to believe that the Defendant, Keri Dougherty, lives somewhere in the immediate area of the parents, Kevin and Georgiana Dougherty, and that service will be obtained sometime in the near future.

5. The Plaintiff has acted in good faith and with diligence to obtain service of process, but has been delayed only because of the intentional refusal to cooperate by the other two Defendants.

**WHEREFORE**, the Plaintiff, Thelma P. Willis, respectfully requests:

- a. That this matter be allowed to continue in normal course; and
- b. That this Show Cause Order be withdrawn by the Court.

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Attorney for Plaintiff